

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

v.

LAWRENCE SHERMAN,
BRANDON MCCOLLUM, and
JEFFREY WILEY, JR.

Defendants.

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CASE NO.

1:23CR-013

JUDGE

J. DLOTT

INDICTMENT

18 U.S.C. § 2

18 U.S.C. § 371

18 U.S.C. § 1704

18 U.S.C. § 1708

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

1. Defendants LAWRENCE SHERMAN, BRANDON MCCOLLUM, and JEFFREY WILEY, JR. are residents of the Southern District of Ohio.
2. Defendants LAWRENCE SHERMAN and BRANDON MCCOLLUM are believed to be related as cousins.

COUNT 1

(Conspiracy to Commit Mail Theft)

The Conspiracy

3. Paragraphs 1-2 of the Indictment are incorporated as if fully restated herein.
4. From on or about September 2022 and continuing through on or about February 2023, in the Southern District of Ohio and elsewhere, the defendants, and others known and unknown to the Grand Jury, knowingly, and with intent to further the conspiracy and to defraud, conspired and agreed with each other and with others known and unknown to the

Grand Jury to commit the offense of theft of mail and possession of stolen mail (18 U.S.C. Section 1708).

Purpose and Object of the Conspiracy

5. The purpose and object of the conspiracy was for the defendants, LAWRENCE SHERMAN, BRANDON MCCOLLUM, and JEFFREY WILEY, JR., and others known and unknown to the grand jury, to unlawfully enrich themselves by wrongfully obtaining USPS arrow keys, stealing mail from USPS deposit boxes (or blue boxes), and then fraudulently converting the financial instruments in the mail (such as checks and money orders) to their own financial benefit.

The Manner and Means of the Conspiracy

6. The manner and means by which the Defendants sought to accomplish the objectives of the conspiracy included the following:
 - a. It was part of the conspiracy that members of the conspiracy, known and unknown to the Grand Jury, illegally obtained arrow keys that belonged to the U.S. Postal Service. The arrow keys are used to open the blue postal mailboxes used for the public collection of mail.
 - b. The arrow keys were then used by members of the conspiracy to steal mail from the blue mailboxes.
 - c. After stealing the mail, members of the conspiracy would steal any cash contained within the mail. Members of the conspiracy would also steal checks contained in

the mail, “wash” or erase the true check information, and then attempt to fraudulently convert the checks.

- d. The conspiracy was executed by the Defendants primarily in the Cincinnati area.

Overt Acts

7. In furtherance of this conspiracy, the following overt acts were committed in the Southern District of Ohio by the Defendants and/or one of the coconspirators:

- a. On September 3, 2022, JEFFREY WILEY, JR. and BRANDON MCCOLLUM were pursued by the City of Wyoming police in a dark Infiniti Q50 for various traffic violations. The vehicle failed to stop and fled at excessive speeds. The vehicle was abandoned and the two black occupants fled on foot before being arrested. MCCOLLUM provided a false reason for running to the officers and false information about the driver, WILEY. The vehicle contained 26 uncashed checks and money orders in the passenger side door (worth \$10,459.11). The checks and money orders were made to 16 different people and were stolen from the mail.
- b. On or about January 23, 2023, a silver Nissan Versa with Florida license plates was spotted near Brentwood Plaza. When police attempted to pull over the vehicle, the vehicle fled at a high rate of speed. It swerved out of the way of one set of stop sticks but eventually hit a second set of stopsticks. BRANDON MCCOLLUM was

arrested in the car. Several pieces of mail were discovered in the vehicle, including opened personal checks. The mail was stolen from a mail box.

- c. At the time of his arrest on January 23, 2023, BRANDON MCCOLLUM had a USPS arrow key concealed in his buttocks.
- d. On or about February 5, 2023, Greenhills Police spotted a Jeep Cherokee SUV that was speeding and reported stolen January 23rd. When Greenhills police pursued the Jeep Cherokee, the vehicle did not pull over and led the police on a high speed chase. Again, the vehicle was stopped only through the use of stop sticks. When the vehicle stopped, individuals fled from the car and were later arrested. LAWRENCE SHERMAN was the driver of the car. Stolen mail was found inside the car. In addition, stolen mail was thrown out of the car during the chase and recovered roadside. Check washing materials were recovered in the car.
- e. On or about August 3, 2022, MCCOLLUM deposited a stolen \$4900 check in the name of K.J. On the same day, MCCOLLUM and SHERMAN were together and withdrawing \$800 from the same account. The check had been stolen from the U.S. mail.
- f. On or about October 28, 2022, an unattended bag was found at CVG airport with the name tag "Jay Robinson." While searching through the bag, airport officials found an ID for LAWRENCE SHERMAN in a wallet, along with 8 debit cards with different names on them. Eventually, SHERMAN claimed the bag. The bag contained \$10,771 in cash, a cell phone, and a USPS receipt for a mail package. The USPS mail package was addressed to an associate and a Miami, FL address. The sender was "Charles Woods," but the sender address returns to a residence of

SHERMAN. The mail package was located in the Southern District of Ohio and contained 13 stolen debit cards, 48 checks and 9 money orders. The checks and money orders were stolen from the U.S. mail.

In violation of 18 U.S.C. § 371.

COUNT 2

(Possession of Stolen Mail - Wyoming)

8. On or about September 3, 2022, in the Southern District of Ohio, BRANDON MCCOLLUM and JEFFREY WILEY, JR., aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully control and possess letters, mail, and articles contained therein which had been stolen, taken, embezzled and abstracted from a letter box or mail receptacle which was an authorized depository for mail matter, knowing said letter or mail to have been stolen or taken from an authorized depository for mail matter; to wit, the stolen mail during a police chase in or around Wyoming, Ohio.

In violation of 18 U.S.C. §§ 1708(c) and 2.

COUNT 3

(Possession of Stolen Mail – USPS Receipt)

9. On or about October 28, 2022, in the Southern District of Ohio, LAWRENCE SHERMAN, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully control and possess a letter, mail, or article contained therein which had been stolen, taken, embezzled and abstracted from a letter box or mail receptacle which was an authorized depository for mail matter, knowing said letter or mail to have been stolen or taken from an authorized depository for mail matter; to wit, a USPS parcel he mailed to an address in Miami, Florida that contained 48 checks and 9 money orders.

In violation of 18 U.S.C. §§ 1708(c) and 2.

COUNT 4

(Possession of Stolen Mail – Springfield Twp.)

10. On or about January 23, 2023, in the Southern District of Ohio, BRANDON MCCOLLUM, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully control and possess a letter, mail, or article contained therein which had been stolen, taken, embezzled and abstracted from a letter box or mail receptacle which was an authorized depository for mail matter, knowing said letter or mail to have been stolen or taken from an authorized depository for mail matter; to wit, the stolen mail during a police chase in or around Springfield Township, Ohio.

In violation of 18 U.S.C. §§ 1708(c) and 2.

COUNT 5

(Possession of Stolen Mail Key – Springfield Twp.)

11. On or about January 23, 2023, in the Southern District of Ohio, BRANDON MCCOLLUM, aided and abetted by others known and unknown to the Grand Jury, did knowingly steal and purloin (or obtain by false pretense) a key suited to locks adopted by the Postal Service and in use on mail depository boxes or other authorized receptacles for the deposit of mail matter.

In violation of 18 U.S.C. §§ 1704 and 2.

COUNT 6

(Possession of Stolen Mail - Greenhills)

12. On or about February 5, 2023, in the Southern District of Ohio, LAWRENCE SHERMAN, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully control and possess a letter, mail, or article contained therein which had been stolen, taken, embezzled and abstracted from a letter box or mail receptacle which was an authorized depository for mail matter, knowing said letter or mail to have been stolen or

taken from an authorized depository for mail matter; to wit, the stolen mail during a police chase in or around Greenhills, Ohio.

In violation of 18 U.S.C. §§ 1708(c) and 2.

A TRUE BILL.

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FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**

Tim Mangan

**TIMOTHY S. MANGAN, 069287
ASSISTANT UNITED STATES ATTORNEY**